

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

: NO. 1:08-CR- 314

v. :

: (JUDGE )

RICHARD D. BYRD, a/k/a "Mook," :

Caldwell

CLIFTON SHIELDS, a/k/a "D" and :

FILED

LAURA BETH SHOPE, :

HARRISBURG, PA

Defendants. :

AUG 13 2008

INDICTMENT

MARY E. D'Amato, Clerk  
Per \_\_\_\_\_  
Deputy Clerk

COUNT I

(Criminal Conspiracy to Distribute  
and PWID Heroin and Cocaine Base)

THE GRAND JURY CHARGES THAT:

From on or before March 1, 2008, the exact date being unknown to the Grand Jury, and continuing to on or about July 24, 2008, in Huntingdon County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**RICHARD D. BYRD, a/k/a "Mook,"  
CLIFTON SHIELDS, a/k/a "D" and  
LAURA BETH SHOPE,**

knowingly and intentionally combined, conspired, confederated, and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to commit the following offenses against the United States: to knowingly and intentionally distribute and possess with the intent to distribute and dispense a

mixture and substance containing a detectable amount of heroin and 50 grams and more of a mixture or substance which contains cocaine base, also known as "crack cocaine," in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(iii).

All in violation of Title 21, United States Code, Section 846.

**COUNT II**

(Distribution and PWID Heroin and Cocaine Base)

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or before June 2008, the exact date being unknown to the Grand Jury, and continuing to on or about July 23, 2008, in Huntingdon County, within the Middle District of Pennsylvania and elsewhere, the defendant,

**RICHARD D. BYRD, a/k/a "Mook,"**

knowingly and intentionally distributed and possessed with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance and 50 grams and more of a mixture or substance containing cocaine base, also known as "crack cocaine," a Schedule II controlled substance, and did aid, abet, counsel, command, induce and procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and

(b)(1)(A)(iii) and Title 18, United States Code, Section 2.

**COUNT III**

(Distribution and PWID Heroin and Cocaine Base)

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or before March 1, 2008, the exact date being unknown to the Grand Jury, and continuing to on or about July 23, 2008, in Huntingdon County, within the Middle District of Pennsylvania and elsewhere, the defendant,

**CLIFTON SHIELDS, a/k/a “D” ,**

knowingly and intentionally distributed and possessed with intent to distribute 50 grams and more of a mixture or substance containing cocaine base, also known as “crack cocaine,” a Schedule II controlled substance, and did aid, abet, counsel, command, induce and procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(iii) and Title 18, United States Code, Section 2.

**COUNT IV**

(Distribution and PWID Heroin and Cocaine Base)

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or before November 2007, the exact date being unknown to the Grand

Jury, and continuing to on or about July 23, 2008, in Huntingdon County, within the Middle District of Pennsylvania and elsewhere, the defendant,

**LAURA BETH SHOPE,**

knowingly and intentionally distributed and possessed with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance and 50 grams and more of a mixture or substance containing cocaine base, also known as "crack cocaine," a Schedule II controlled substance, and did aid, abet, counsel, command, induce and procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(iii) and Title 18, United States Code, Section 2.

**COUNT V**

(Possession of a Firearm During and  
in Relation to a Drug Trafficking Crime)

Beginning at least as early as July 23, 2008, in the Middle District of Pennsylvania, the defendants,

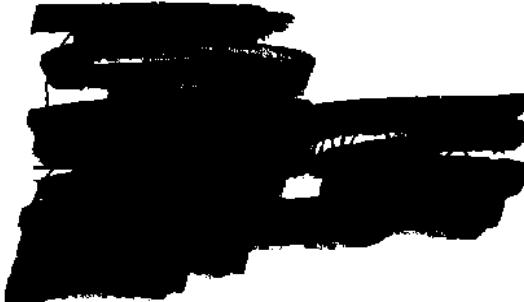
**CLIFTON SHIELDS, a/k/a "D" and  
LAURA BETH SHOPE,**

did knowingly use and possess a firearm, to wit: Smith & Wesson, Model 12, .38 caliber hand gun, with a partially obliterated serial number, during, in relation to and

in furtherance of a drug trafficking crime, for which he or she may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

*Martin C. Carlson*  
MARTIN C. CARLSON *as per*  
United States Attorney

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8/13/08  
Date